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20 Attorneys for Plaintiff
 21 IYO, INC.

22
UNITED STATES DISTRICT COURT
 23
NORTHERN DISTRICT OF CALIFORNIA

24 IYO, INC.

25 Case No. 3:25-cv-4861

26 Plaintiff,
 27
 28 v.
 29 IO PRODUCTS, INC., OPENAI, INC.,
 30 OPENAI, LLC, SAM ALTMAN, and SIR
 31 JONTHON PAUL IVE,
 32 Defendants.

33
**DECLARATION OF JEFF HYMAN IN
 34 SUPPORT OF PLAINTIFF IYO, INC.'S
 35 MOTION FOR TEMPORARY
 36 RESTRAINING ORDER AND
 37 PRELIMINARY INJUNCTION**

38 Complaint Filed: June 9, 2025
 39 Trial Date: None Set

1 I, Jeff Hyman, do hereby declare as follows:

2 1. I am the outside General Counsel of Plaintiff IYO, Inc. ("Plaintiff" or "IYO") in the
3 above-captioned matter. I am over 18 years of age. I have personal knowledge of the facts stated
4 herein, and if called as a witness, I could and would testify competently thereto. I make this
5 declaration in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary
6 Injunction ("Motion").

7 2. On June 9, 2025, I emailed notice of Plaintiff's Motion to the Defendants' attorney,
8 Margret Caruso of Quinn Emmanuel Urqhert & Sullivan, whom I understand represents all the
9 Defendants, and asked her to confirm as such. I will send conformed copies of the Motion, the
10 Complaint, and their accompanying documents, to Ms. Caruso after they are filed with the Court.
11 Once the Court sets a date and time for the hearing on Plaintiff's Motion, I will also send the same
12 to Ms. Caruso.

13 I declare under penalty of perjury under the laws of the United States of America that the
14 foregoing is true and correct.

15 Executed on June 9, 2025 in Menlo Park, California.

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Signed by:
Jeff Hyman
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Jeff Hyman

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